

4. Ms. Smith's Pretrial Services Officer reports that Ms. Smith is in compliance with her conditions of release and Pretrial Services does not oppose this modification to her release conditions.

6. The Bail Reform Act (“The Act”) requires the release of a person facing trial under the least restrictive condition or combination of conditions that will reasonably assure the appearance of the person as required and the safety of the community. *United States v. Salerno*, 481 U.S. 739, 755 (1987). In deciding whether to impose certain conditions for pretrial release, the Court is obligated to consider the two dual goals of 18 U.S.C. § 3142. The two express goals of 18. U.S.C. § 3142 are (1) to reasonably assure a defendant’s presence in court and (2) to protect the public. *Id.* To determine whether there are conditions that would reasonably protect the safety of the community, the court should consider whether the defendant will likely make a good faith effort at complying with the conditions and whether the conditions are easily circumvented or manipulated. *United States. v. Hir*, 517 F.3d 1081, 1092 (9th Cir. 2008). To make this determination, there must be an “individualized, fact-specific inquiry.” *Id.*, at 1094.

7. Ms. Smith made her initial appearance before the Court on October 3, 2022, and has been on pretrial supervision since that date. ECF No. 7.

10. Wherefore, the parties hereby stipulate and request that this Court order Pretrial Services to temporarily return to Ms. Smith her passport as outlined above, and that Ms. Smith be permitted to travel to Mexico during the dates stated above, but only after providing to her Pretrial Services Officer her itinerary and address where she will be staying in Mexico.

By /s/ Kimberly M. Frayn
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